Exhibit 8

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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

In re FACEBOOK BIOMETRIC INFORMATION PRIVACY LITIGATION	Master File No. 3:15-cv-03747-JD
	CLASS ACTION
This Document Relates To:	DECLARATION OF NIMESH PATEL
ALL ACTIONS.	

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1   I, Nimesh Patel, declare as follows:

2   1.   I am a resident of the state of Illinois and I am one of the three named plaintiffs and

3 Class Representatives in the above-referenced case against Facebook, Inc. ("Facebook").

4   2.   I respectfully submit this Declaration in support of the $650,000,000 settlement (the

5 "Settlement") of this case between the plaintiffs and the certified Class of Facebook users for

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7 whom Facebook created or stored a face template after June 7, 2011.

8   3.   I have directly participated in the case from its inception. On May 14, 2015, I filed

9 a lawsuit against Facebook under the Illinois Biometric Information Privacy Act, 740 ILCS 14/1

10 *et seq.*. Since that time, I have been kept fully informed of case developments and procedural

11 matters over the course of the case, including regular correspondence with my lawyers at Robbins

12 Geller Rudman & Dowd LLP ("Robbins Geller") concerning discovery, class certification,

13 summary judgment, Ninth Circuit briefing and review, the potential for United States Supreme

14 Court review, settlement negotiations and the ultimate proposed resolution of this case.

15 Specifically, as part of my role as a named plaintiff and Class Representative in this case, and in

16 addition to the above, I searched for and provided information in response to discovery requests

17 from Facebook, and sat for two depositions, the first on February 16, 2016, and the second on

18 December 7, 2017. I also worked closely with my lawyers at Robbins Geller to prepare for these

19 depositions, and to prepare a declaration in support of Plaintiffs' Motion for Class Certification.

20 In addition, I participated in person in the Court-ordered mediation with Magistrate Judge Ryu on

21 May 4, 2018.

22   4.   Altogether, I would estimate that I have expended at least 55 hours participating in

23 and helping to oversee this litigation on behalf of the Class.

24   5.   I have discussed with counsel and evaluated the risks of continuing the case and

25 authorized counsel to settle this matter for $650,000,000 for Class members and non-monetary

26 relief, including the requirement that Facebook turn off Facial Recognition for everyone in the

27 Class unless those people provided their informed choice to turn it back on (and that all face

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1 templates will be deleted if people don't agree to turn it back on). I believe this Settlement is fair

2 and reasonable and is in the best interest of the Class members.

3   I declare under penalty of perjury that the foregoing is true and correct.

4   Executed this 14 day of October, 2020 at Chicago, IL.

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7   *Nimesh Patel*
                                               NIMESH PATEL

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